

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

RIXIE DILLARD,

Plaintiff,

vs.

HALLA CLIMATE SYSTEMS ALABAMA
CORPORATION, HALLA CLIMATE
CONTROL CORPORATION, AND
VISTEON CORPORATION,

Defendants.

Case No. 3:06 CV 506-CSC

DEFENDANT'S
MOTION FOR ADMISSION *PRO HAC VICE* FOR DABNEY D. WARE

NOW INTO COURT, through the undersigned counsel, comes Defendants, Halla Climate Systems Alabama Corporation, Halla Climate Control Corporation, and Visteon Corporation, (hereinafter referred to as "Defendants"), and prays that DABNEY D. WARE, Esquire, be permitted to make a special appearance in the above-captioned matter on the following grounds set forth below:

1. Petitioner DABNEY D. WARE, Esquire is a member is good standing of the bar of the State of Florida, and is admitted to practice law before the bars of the State of Florida and Georgia and in the United State District Court for the Middle, Northern and Southern Districts of Florida; and the United States Courts of Appeal for the Third, Fifth, Sixth and Eleventh Circuits.

2. Petitioner DABNEY D. WARE, Esquire, requests permission of this Court to make a special appearance on behalf of the Defendants for the purposes of representing the interests of Defendants in the above-captioned matter.

Petitioner, DABNEY D. Ware, Esquire, has locally retained Thomas L. Oliver, II, Esquire, of the law firm of Carr Allison, 100 Vestavia Parkway, Birmingham, AL 35216, to represent it in this matter. Local counsel is a member of the Alabama Bar and in the United States Court for the Middle District of Alabama and attests to the good character and reputation of Ms. Ware. Ms. Ware has received and reviewed the Local Rules of this Court and affirms that she will abide by those rules. Local counsel will continue as attorney of record in this matter in accordance with the Local Rules and will be available for communication with opposing counsel and the Court.

MEMORANDUM OF LAW

Rule 83.1(b) of the Uniform Local Rules of the United States District Courts for the Northern District of Alabama provides in pertinent part that in order for an attorney to be admitted *pro hac vice*:

Any attorney who is not a member of the bar of this court but who is admitted to practice before the United States District Court for the district in which (or before the highest court in the state in which) such person resides or regularly practices law, may, upon request and payment of the prescribed fee (unless payment is waived by special order of the court), be allowed to appear in a case pro hac vice by an order of any district judge or bankruptcy judge of this court. Any such attorney who appears as counsel by filing any pleading or paper in any case pending in this court shall within ten days thereafter apply to appear pro hac vice as set out herein. An attorney permitted to appear under this subsection is deemed to have conferred disciplinary jurisdiction upon this court for any alleged misconduct arising in the course of, or in preparation for, proceedings in the case; and for purposes of subsection (h) of this Rule the attorney shall be treated as if a member of the bar of this court with respect to acts and conduct in connection with such case.

WHEREFORE, Petitioner, DABNEY D. WARE respectfully request this Honorable Court to issue an order permitting her to make a special appearance for the purpose of representing the Defendants in the above-captioned matter.

Respectfully submitted,

CARR ALLISON

/s/ Thomas L. Oliver, III
THOMAS L. OLIVER, II
Carr Allison
100 Vestavia Parkway
Birmingham, AL 35216
(205) 949-2942 (telephone)
(205) 822-2057 (facsimile)

DABNEY D. WARE
Foley & Lardner LLP
One Independent Drive, Suite 1300
Jacksonville, Florida 32202
(904) 359-2000 (telephone)
(904) 359-8700 (facsimile)
(Pro Hac Vice Admission Pending)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Motion for Admission *Pro Hac Vice* for Dabney Ware has been furnished to the following via first class mail, postage prepaid, on this 22nd day of September, 2006.

Roderick T. Cooks
319-17th Street North
Birmingham, AL 35203

/s/ Thomas L. Oliver, II
Attorney

